

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

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GILBERTO MARTINEZ GOMEZ
LAURA M. SERRANO SANTANA
Debtor(s)

* CASE NO. 12-03113-MCF

* CHAPTER 13

BANCO POPULAR DE PR

* INDEX

Movant

*

GILBERTO MARTINEZ GOMEZ
LAURA M. SERRANO SANTANA
And ALEJANDRO OLIVERAS RIVERA
as DEBTOR(S), TRUSTEE

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Respondent (s)

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DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE COURT:

NOW COME, **GILBERTO MARTINEZ GOMEZ and LAURA M. SERRANO SANTANA**, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. Banco Popular de Puerto Rico filed a Motion for relief from the automatic stay, basically alleging that debtors are in arrears in three (3) post-petition direct payments to said creditor.

2. The debtors hereby respectfully submit that they are in the process of meeting with Banco Popular de Puerto Rico to qualify for a mortgage loan modification. Therefore, the debtors need thirty (30) days to inform the Court accordingly.

3. Based on the aforesaid, the debtors hereby respectfully request this Honorable Court re-schedule this index filed by Banco Popular de Puerto Rico for a final hearing.

Debtor's Response to §362 Motion
Case no. 12-03113-MCF

WHEREFORE, debtors respectfully request from this Honorable Court to schedule a final hearing to consider the motion for relief from stay filed by Banco Popular de Puerto Rico.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of the same to: the Chapter 13 Trustee Alejandro Oliveras Rivera, Esq.; Martinez & Torres Law Offices, Marysol Lopez Gonzalez, Esq., Counsel for Banco Popular de Puerto Rico; I also certify that a copy of this motion has been sent via US Postal Service to the debtors/respondent Gilberto Martinez Gomez Idamaris Gardens B 9 Calle Salustiana Colon Caguas PR 00725 and Laura M. Serrano Santana Hacienda San Jose 415 Via Campina Caguas PR 00727.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 16th day of July, 2013.

/s/Roberto Figueroa Carrasquillo

ROBERTO FIGUEROA CARRASQUILLO

USDC #203614

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